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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Cynthia Wheeler,  
Plaintiff,

v.

Trans Union, LLC, Experian Information  
Solutions, Inc., Equifax Information Services,  
LLC, America First Credit Union, Capital One  
Bank (USA) N.A. and Kohl's Inc.,

Defendants.

Case No.: 2:22-cv-01660-GMN-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE ANSWER  
OR OTHER REPONSIVE PLEADING**

Plaintiff, CYNTHIA WHEELER, by and through her counsel, the KIND LAW and  
FREEDOM LAW FIRM, and KOHL'S INC., by and through its counsel, KRAVITZ  
SCHNITZER JOHNSON & WATSON, CHTD., hereby stipulate and agree as follows:

1. Plaintiff filed her Complaint for Damage Pursuant to the Fair Credit Reporting Act,  
15 U.S.C. §1681, *et. seq.* on September 2, 2022;
2. Plaintiff served Kohl's Inc. on October 1, 2022;
3. Kohl's Inc.'s deadline to respond, move or otherwise plead to the Complaint is  
October 25, 2022;
4. Plaintiff and Kohl's Inc. have agreed to continue Kohl's Inc.'s responsive deadline  
until November 28, 2022;<sup>1</sup>

<sup>1</sup> A thirty-day extension of the deadline here would set a responsive deadline of November 24, 2022, which is the Thanksgiving Holiday. Accordingly, the responsive pleading deadline has been continued to the following Monday, November 24, 2022.

5. This continuance will allow Kohl's Inc. to review its records pertaining to the allegations in the Complaint, and allow the Parties time to meaningfully discuss the merits of the same.

6. This is the first stipulation between the Plaintiff and Kohl's Inc. to extend the time for Kohl's Inc. to respond, move, or otherwise plead to the Complaint and it is not being entered into for purposes of delay.

DATED this 21st day of October, 2022.

DATED this 21st day of October, 2022.

KRAVITZ SCHNITZER  
JOHNSON & WATSON, CHTD.

KIND LAW

/s/ Michael R. Esposito, Esq.  
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**ORDER**

**IT IS SO ORDERED**

**DATED:** 12:25 pm, October 24, 2022



**BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE**

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